

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**RENEE ZINSKY,**

Civil Action No. 2:22-cv-547(MJH)

Plaintiff,

The Honorable Marilyn J. Horan

vs.

**MICHAEL RUSSIN, RUSSIN FINANCIAL,  
RUSSIN GROUP, SIMON ARIAS, III,  
ARIAS AGENCIES, S.A. ARIAS  
HOLDINGS, LLC, AMERICAN INCOME  
LIFE INSURANCE COMPANY,**

ELECTRONICALLY FILED

Defendants.

**DEFENDANT AMERICAN INCOME LIFE INSURANCE COMPANY'S  
MOTION TO COMPEL ARBITRATION AND STAY THE CASE**

Pursuant to the Federal Arbitration Act, 9 U.S.C. §§ 1 *et seq.*, Defendant American Income Life Insurance Company (“AIL”) respectfully moves the Court for an order compelling Plaintiff Renee Zinsky to arbitrate all of her claims against AIL. In the interest of efficiency and to preserve the intent of the parties as memorialized in their arbitration agreements, AIL also requests that the Court stay all proceedings including discovery in this action, pending final resolution of Defendant’s Motion and the completion of any arbitral proceeding pursued by Plaintiff pursuant to her Agent Contract. AIL has not discussed this motion with Plaintiff’s counsel as this issue is moot given that Plaintiff violated her agreement to arbitrate by filing a complaint in court and she is seeking rescission of that agreement therein.

1. In support of this Motion, AIL states that Renee Zinsky entered into valid arbitration agreements with AIL that cover all claims brought against AIL in this action.
2. In support of this Motion, AIL refers the Court to the Declarations of Debra Gamble and Anne R. Dana, sworn to on June 10, 2022 and June 13, 2022 respectively, and

exhibits thereto, and to the Memorandum of Law in Support of the Motion filed herewith.

WHEREFORE, AIL respectfully requests that the Court issue an Order:

- a. Compelling Renee Zinsky to arbitrate all of her claims against AIL;
- b. Staying all other proceedings including discovery in this action, pending final resolution of Defendant's Motion and the completion of any arbitral proceeding pursued by Plaintiff pursuant to her Agent Contract; and
- c. Affording AIL any other relief that the Court deems just and proper.

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Dated: June 13, 2022

Respectfully submitted,

AMERICAN INCOME LIFE INSURANCE  
COMPANY,

By its attorneys,

By: /s/ Andrea M. Kirshenbaum  
**POST & SCHELL, P.C.**

Andrea M. Kirshenbaum (Pa. Bar No. 88030)  
Four Penn Center  
1600 John F. Kennedy Blvd, 14<sup>th</sup> Floor  
Philadelphia, PA 19103  
Tel: (215) 587-1126  
Fax: (412) 227-9065

Rachel E. Lutz (Pa. Bar No. 315462)  
One Oxford Centre  
301 Grant Street, Suite 3010  
Pittsburgh, Pennsylvania 15219  
Tel: (412) 227-8887  
Email: akirshenbaum@PostSchell.com  
rlutz@PostSchell.com

**King & Spalding LLP**  
Albert Giang (Cal. Bar No. 224332)  
James A. Unger (Cal. Bar No. 325115)  
633 West Fifth Street, Suite 1600  
Los Angeles, California 90071  
Tel: (213) 218-4002  
Fax: (213) 443-4310  
Email: agiang@kslaw.com  
junger@kslaw.com

Anne R. Dana (NY Bar No. 5011366)  
1185 Avenue of the Americas  
34<sup>th</sup> Floor  
New York, NY 10036  
Tel: (212) 556-2100  
Email: adana@kslaw.com

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